

Tanglewood Privacy Statement

Data Covered By This Privacy Statement

This Privacy Statement describes the privacy practices of Tanglewood Resort for data that we collect:

- Through websites operated by us from which you are accessing this Privacy Statement, including TanglewoodResort.com and other websites owned or controlled by Tanglewood (collectively, the “Websites”);
- Through the software applications made available by us for use on or through computers and mobile devices (the “Apps”);
- Through our social media pages that we control from which you are accessing this Privacy Statement (collectively, our “Social Media Pages”);
- Through email messages that we send you that link to this Privacy Statement and through your communications with us online or in person;
- From third parties such as Authorized Licensees, Owners and Franchisees, and Other Sources, such as public databases, marketing partners and other third parties; and
- When you visit or stay as a guest at one of our properties or through other offline interactions (collectively, “Property Visits and Offline Interactions”).
- Collectively, we refer to the Websites, the Apps, and our Social Media Pages, as the “Online Services” and together with the Property Visits and Offline Interactions, the “Services”.

The Data We Collect

At touchpoints throughout your guest journey, we collect Personal Data in accordance with the law, and to serve you better, “Personal Data” is information that may identify you as an individual or relate to you as an identifiable individual. We collect and process the following types of Personal Data about you:

- Name
- Gender
- Postal Address
- Telephone Number
- Email Address
- Financial Information (such as credit and debit card number or other payment data)
- Language Preference
- Date and place of birth
- Nationality, passport, visa, or other government-issued identification data
- Important dates: birthdays, anniversaries, and special occasions
- Membership or loyalty program data (including co-branded payment cards, travel partner program affiliations)
- Employer details (for business-related bookings)
- Travel itinerary, tour group, or activity data
- Prior guest stays or interactions, goods and services purchased, special service and amenity requests
- Social media account ID, profile photo and other data publicly available, or data made available by linking your social media and loyalty accounts

In more limited circumstances, we may also collect:

- Data about family members and companions, names, and ages of children
- Images, video and audio data via: (a) security cameras located in public areas, such as hallways and lobbies, in our properties; and (b) body-worn cameras carried by our loss prevention officers and other security personnel

We may also collect information about your “Preferences” that we use to make your current and future stays and experience with us more enjoyable, including information about your interests and other relevant information that we learn about you during your stay. This may also include any likes and dislikes about our services that you tell us about so that we can improve our services, and specific dietary, health restrictions or personal needs to ensure your wellbeing. We may also collect your “Personal Preferences,” that may include details of your special anniversaries (such as your birthday and wedding anniversary), what type of activities you prefer to take part in when staying with us, and your hobbies. Personal Preferences may also include details about who you usually travel with, their relationship to you, and your marital status.

If you submit any Personal Data about other people to us or our Service Providers (e.g., if you make a reservation for another individual), you represent that you have the authority to do so and you permit us to use the data in accordance with this Privacy Statement.

Cookies and Other Data

We may also collect “Other Data” that generally do not reveal your specific identity or do not directly relate to an identified individual. To the extent Other Data reveal your specific identity or relate to an individual, we will treat Other Data as Personal Data. Other Data include:

- Your browser or device. We collect certain data through your browser or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Apple), screen resolution, operating system name and version, device manufacturer and model, language, internet browser type and version and the name and version of the Online Services (such as the Apps) you are using. We use this data to ensure that the Online Services function properly.
- Your use of the Apps. We collect certain data when you download and use an App, such as App usage data, the date and time the App on your device accesses our servers, and what data and files have been downloaded to the App based on your device number. We use this data to ensure that the Online Services function properly. Our Apps may contain software development kits (SDKs) from third parties which may collect and transmit Other Data to enable various features in the App. WE may also collect mobile device advertising identifiers to enhance and personalize your experience and deliver relevant products, content, or ads to show you on our Website, Apps, or external advertising.
- Cookies. We collect certain data from cookies, which are pieces of data stored directly on the computer or mobile device that you are using. Cookies allow us to collect browser type, time spent on the Online Services, pages visited, referring URL, language preferences, and other aggregated traffic data. We use functional cookies to obtain the data for security purposes, to facilitate navigation, to display content more effectively, to collect statistical data, to personalize your experience while using the Online Services, and to recognize your computer to assist your use of the Online Services. We also gather statistical cookie data about use of the Online

Services to continually improve design and functionality, understand how they are used and assist us with resolving questions. Advertising cookies further allow us to select which advertisements or offers are most likely to appeal to you and display them while you are using the Online Services. We also use them to send marketing emails and to track responses to online advertisements and marketing emails.

- Pixel Tags and other similar technologies. We collect data from pixel tags (also known as web beacons and clear GIFs), which are used with some Online Services to, among other things, track the actions of users of the Online Services (including email recipients), measure the success of our marketing campaigns, and compile statistics about usage of the Online Services.
- Analytics. We collect data through Google analytics and Adobe Analytics, which use cookies and technologies to collect and analyze data about use of the Services. These services collect data regarding the use of other websites, apps, and online resources. You can learn about Google's practices by going to www.google.com/policies/privacy/partners and opt out by downloading the Google Analytics opt out browser add-on, available at <https://tools.google.com/dlpage/gaoptout> . You can learn more about Adobe and opt out by visiting <http://www.adobe.com/privacy/opt-out.html>
- Your IP Address. We collect your IP address, a number that is automatically assigned to the device that you are using by your Internet Service Provider (ISP). An IP address is identified and logged automatically in our server log files when a user accesses the Online Services, along with the time of the visit and the pages that were visited. We use IP addresses to calculate usage levels, diagnose server problems and administer the Online Services. We also may derive your approximate location from your IP address.
- Aggregated and Segmented Data. We may aggregate data that we collect, and this aggregated data will not personally identify you or any other user. We may also use both Personal Data and Other Data to divide customers into segments, or groups, in order to provide more relevant advertising.
- Precise Location-Based Services. With your consent, we may collect the precise physical location of your device by using satellite, cell phone tower, Wi-Fi signals, or other technologies. We will collect this data if you opt-in through the App or other program (either during your initial login or later) to improve special offers and to enable location-driven capabilities on your device. If you have opted-in to share your location, the App or other program will continue to collect location data based on how you chose to serve the data.
- Precise Location Opt-Out: The user can specify via the device's operating system to always share location, only when the App is in use, or never. If you choose only when the App is in use, we will have access to the data until you log off or close the application or if you use your phone's or other device's settings to disable location capabilities for the app or other program.

How and Where We Collect Your Data

This Privacy Statement describes the privacy practices of Tanglewood for Personal and Other Data that we collect through the following:

- Tanglewood. We collect Personal Data and Other Data from other companies within Tanglewood for the purposes described in this Privacy Statement, such as providing and personalizing the Services, communicating with you, facilitating the loyalty programs and to accomplish our business purposes.

- Authorized Licensees. We collect Personal Data and Other Data from companies when we enter into a license or similar agreement to sell goods and services under a Tanglewood brand (“Authorized Licensees”).
- On-Property and/or Travel Providers. We may collect your Personal Data and Other Data from spa, restaurant, health club, concierge, and other outlets at our properties.
- Linked Accounts. We collect Personal Data and Other Data when you use your membership number or Online Services login to receive or register for certain third party services. These companies include restaurant reservations. Additionally, your social media account provider allows you to connect your social media account to your Online Services account or log into your Online Services account from your social media account. When you enroll in those services, we disclose your Personal Data and Other Data to those third parties. If you do not want us to collect your Personal Data or Other Data in this way, do not provide your membership number to third parties, do not use your Online Services login to register for third-party promotions and do not connect your Online Services account with accounts on third-party services.
- Promotional Activity. We collect Personal Data and Other Data from third parties who may provide promotions to you, such as sweepstakes, contexts, or other offers.
- Group Booking Program. If you are an employee of a company that participates in a Group Booking and book your room using a company corporate code or pay for your expenses using a corporate credit card, we may collect Personal Data and Other Data related to your stay or employment. This Privacy Statement does not apply to the handling of your Personal Data by your employer, credit card company or bank, and we are not responsible for their practices.
- Other Sources and Service Providers. We collect Personal Data and Other Data from various third parties, such as public databases, joint marketing partners and online travel agencies (OTAs).
- Online Services. We collect Personal Data and Other Data when you interact with our Online Services, by performing such actions as, but not limited to, browsing, making a reservation, purchasing goods and services from our Websites or Apps, communicating with us or otherwise connecting with us or posting to social media pages, or signing up for a newsletter or participating in a survey, contest or promotional offer.
- Customer Care Centers. We collect Personal Data when you make a reservation over the phone, communicate with us by email, fax, or via online chat services or contact customer service. These communications may be recorded for purposes of quality assurance and training.
- Internet-Connected Devices. We collect Personal and Other Data from internet-connected devices available in our properties. For example, when you connect a device to the hotel’s internet, or when a smart home assistant may be available for your use to tailor your accommodations and experience.

Why We Collect Your Data (Legal Basis)

Purpose	Description of Activities Associated With Purpose	Legal Bases
Booking & Guest Registration	There are a number of activities associated with this purpose, such as: facilitating reservations and bookings of hotel accommodations and related services; engaging in pre-arrival communications	Performance of contract for the individual with the guest booking the room

	<p>(logistics, changes, preferences, etc.); and processing payments and security deposits.</p>	<p>Legitimate interests for the individual booking the room, for example, honoring their preferences, as well as for any individuals accompanying the primary guest (e.g., spouse, children, friends)</p> <p>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</p>
<p>On-Site Reception and Stay Services</p>	<p>There are a number of activities associated with this purpose, such as: facilitating check-in and check-out; processing payments; providing consistent and personalized service and advice about the on-site services; providing concierge, luggage storage and parking services; making arrangements with third-party providers on behalf of guests; administering and facilitating access to Wi-Fi, TV and other connectivity services and entertainment systems; facilitating in-room dining; housekeeping services and dry-cleaning services; handling customer requests, inquiries and complaints; and determining eligibility for age-restricted goods and services.</p>	<p>Performance of contract, such as processing payments</p> <p>Legitimate interests, such as honoring the guest’s preferences</p> <p>Consent, such as collecting information regarding dietary preferences that the guest chooses to provide</p> <p>Legal obligations, such as collecting national ID numbers where legally required</p>
<p>Conferences & Events</p>	<p>There are a number of activities associated with this purpose, such as: communicating with customers about conferences and other event planning (“Events”); facilitating reservation and bookings of Events; engaging in pre Event communications (logistics, accommodations, changes, etc.); preparing for and coordinating Events in accordance with customer instructions, expectations and preferences; facilitating catering; communicating about billing and recovering amounts owed; processing payments and security deposits; performing credit checks; handling customer requests, inquiries and complaints; and communicating with participants during Events.</p>	<p>Performance of contract, such as collecting information regarding a planned Event</p> <p>Legitimate interests, such as responding to customer complaints or concerns relating to an Event</p> <p>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</p>

<p>Tanglewood Operations & General Business</p>	<p>There are a number of activities associated with this purpose, such as: administering customer-care services to facilitate and address inquiries, comments and complaints about any of our services (such as in person, through phone lines, email, or on social media); handling security and fraud prevention; administering online services (including troubleshooting, data analysis, testing, system maintenance, support, reporting and the hosting of data); monitoring and analyzing usage of services and using data analytics to improve services, marketing, programs, overall customer experience, gathering feedback, carrying out pilot programs for potential new services and both developing new and improving existing services; and facilitating mergers, acquisitions and other reorganizations and restructurings of our business (including prospective transactions).</p>	<p>Performance of contract, such as ensuring that online services are functioning so that individuals can make reservations or manage loyalty accounts</p> <p>Legitimate interests, such as responding to customer complaints and concerns which may include, where applicable law permits, recording customer service calls</p> <p>Consent, such as for marketing programs</p> <p>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</p>
<p>Emergency & Incident Response</p>	<p>There are a number of activities associated with this purpose, such as: ensuring the security of on-site services; responding to, handling and documenting on-site accidents and medical and other emergencies (including facilitating in-house doctor services); actively monitoring properties to ensure adequate incident prevention, response and documentation (including CCTV); requesting assistance from emergency services; and sending notifications and alerts in the event of incidents or emergencies (such as via SMS, email, call, audio-visual device prompts, etc.).</p>	<p>Performance of contract, such as ensuring the safety of guests and personnel through interactions with on-site security personnel</p> <p>Legitimate interests, such as monitoring properties through CCTV to ensure the safety of guests and personnel</p> <p>Legal obligations, such as documenting on-site accidents</p> <p>Individuals' vital interests, such as contacting medical or emergency services for an ill guest</p>
<p>Legal & Compliance</p>	<p>There are a number of activities associated with this purpose, such as: complying with applicable laws, complying with legal processes, responding to requests from public and government authorities; meeting national security or law enforcement requirements; enforcing our terms and</p>	<p>Legal obligations, such as complying with legal processes</p> <p>Legitimate interests, such as enforcing terms and conditions to protect trademarks</p>

	<p>conditions; protecting our operations; protecting the rights, privacy, safety, or property of Tanglewood, guests, visitors, and other relevant individuals; and allowing us to pursue available legal remedies and limiting the damages that Tanglewood may sustain.</p>	<p>Individuals' vital interests, such as contacting emergency services in case of disturbances and incidents involving guests</p>
<p>Spa, Beauty, Golf & Fitness Services</p>	<p>There are a number of activities associated with this purpose, such as: facilitating reservations and bookings; determining eligibility for services; honoring disability or other health-related restrictions and providing appropriate and safe activities, services and treatments; providing consistent and personalized service based on past usage and preferences expressed by the individual processing payments; arranging requested professionals for specific treatments and services; and handling customer requests, inquiries and complaints.</p>	<p>Performance of contract, such as processing payments</p> <p>Consent, such as collecting information about back problems when providing massage services</p> <p>Legitimate interests, such as providing personalized services</p> <p>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</p> <p>Individuals' vital interests (e.g., when an individual becomes ill while using the fitness equipment)</p>
<p>Food & Beverage Services</p>	<p>There are a number of activities associated with this purpose, such as: facilitating reservations; honoring dietary preferences; providing consistent and personalized service based on past usage and preferences expressed by the individual processing payments, arranging reservations; and handling customer requests, inquiries, and complaints.</p>	<p>Performance of contract, such as processing payments</p> <p>Consent, such as collecting information about dietary, health restrictions, or personal needs of a guest when ordering food</p> <p>Legitimate interests, such as providing personalized services</p> <p>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</p> <p>Individuals' vital interests (e.g., when an individual becomes ill in one of the restaurants)</p>

<p>Child-Related Services (for Parents & Legal Guardians)</p>	<p>There are a number of activities associated with this purpose such as: children’s activities and junior golf program services; facilitating reservations and bookings; preparing for and coordinating hotel accommodations and services in accordance with guest preferences, instructions and expectations; payment and billing services; dining services (children’s menu or discounts)</p>	<p>Performance of contract, such as having a child of a certain age stay in the room with their parents may amount to extra charges or discounts</p> <p>Consent of parent or legal guardian, such as accommodating needs of children</p> <p>Legitimate interests, such as providing a crib or other amenities for children</p> <p>Legal obligations relating to financial transactions, such as the obligation to maintain books and records</p> <p>Individuals’ vital interests, such as when child becomes ill during children’s activities</p>
<p>Accounts & Relationship Management</p>	<p>There are a number of activities associated with this purpose, such as: providing consistent and personalized service based on past usage and the preferences expressed by members; ensuring access to Online Services; processing payments; notifying members about changes to programs, terms and conditions; and handling members’ requests, inquiries and complaints</p>	<p>Performance of contract, such as accessing points and distributing benefits</p> <p>Consent, such as honoring the mode of communication preferences</p> <p>Legitimate interests relating to financial transactions such as the obligation to maintain books and records</p>
<p>Marketing, Promotions, Contests & Third Party Products</p>	<p>There are a number of activities associated with this purpose, such as: communicating about products and services that may be of interest to guests; providing personalized advertisements for products and services on selected websites; facilitating participation in sweepstakes, contests and other promotions (such as best vacation photo contests on social media); and handling customer requests, inquiries and complaints.</p>	<p>Performance of a contract, such as fulfilling obligations associated with a contest</p> <p>Consent, such as honoring the mode of communication preferences</p> <p>Legitimate interests, such as providing advertisements for similar products and services</p>

		Legal obligations, such as handling information consistent with rules relating to sweepstakes
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More Information About Your Personal Preferences

Our goal is to serve you better and meet your expectations and preferred level of hospitality at each stage, from the moment that you book with us through to when you check out. See below to learn more.

Personal Preferences	Purposes	Legal Bases
Anniversaries	When you stay with us, we want to help you celebrate any special occasion, such as an anniversary, birthday. For example, we may make a note of these dates to allow us to provide you with a birthday or anniversary gift.	Consent, where applicable
Activity type and hobbies	We want to ensure that we provide you with services that enhance your Tanglewood experience. To do this, we may retain your preferences about the types of activities that you like to take part in, so that we can ensure we are able to offer you similar experiences when you stay with us in the future.	Consent, where applicable
Relationships	We understand that your Preferences may change depending on who you are traveling with (such as your preferred room type). We may keep a record of your relationships to assist us with making your Tanglewood stay as comfortable as possible. For example, if we know you are traveling with small children, we can proactively plan for additional accommodations such as a crib.	Legitimate interest, in order to provide you with exceptional service Consent, where applicable
Dietary Preferences	When you stay with us, we want to ensure that you are safe, that we are looking after your well being, and to provide you with services to enhance your Tanglewood experience.	Legitimate interest, in order to provide you with exceptional service Consent, where applicable

How and When We Share Your Data

Our goal is to provide you with the highest level of hospitality and Services, and to do so, we may share Personal Data and Other Data with the following:

- Tanglewood Group. We disclose Personal Data and Other Data to other companies within the Tanglewood Group for the purposes described in this Privacy Statement, such as providing and personalizing the Services, communicating with you, facilitating the programs and to accomplish our business purposes. We share your Personal Data and Other Data used for making reservations with the applicable property and Tanglewood entity to fulfill and complete your reservation.
- Authorized Licensees. Where allowed by law we disclose Personal Data and Other Data to our Authorized Licensees, for the purposes described in this Privacy Statement, such as providing and personalizing the Services, fulfilling your requests and providing their own marketing. For example, this sharing enables you to purchase Tanglewood branded goods and services, including timeshare properties and Tanglewood branded real estate.
- On-Property and/or Travel Providers. We may share your information with spa, restaurant, and other outlets at our properties to provide you with services and their own marketing when you stay at one of our properties. This sharing also enables us to provide you with a single source for purchasing packages that include travel-related services, such as airline tickets, rental cars, and vacation packages.
- Group Booking Program. If you are an employee of a company that participates in a Group Booking and book your room using a company corporate code or pay for your expenses using a corporate credit card, an extract of your folio detailing the goods and services provided to you may be sent to your company and to the credit card company. This Privacy Statement does not apply to the handling of your Personal Data by your employer, credit card statement or bank, and we are not responsible for their practices.
- Service Providers. We disclose Personal Data and Other Data to third party service providers including, for example, companies that provide website hosting, data analysis, payment processing, order fulfillment, information technology and related infrastructure provision, customer service, email delivery, marketing, auditing, and other services.

Other Uses and Disclosures

We will use and disclose Personal Data as we believe to be necessary or appropriate: (a) to comply with applicable law, including laws outside your country of residence; (b) to comply with legal process; (c) to respond to requests from public and government authorities, including authorities outside your country of residence and to meet national security or law enforcement requirements; (d) to enforce our terms and conditions; (e) to protect our operations, such as in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of the Tanglewood business, assets or stock (including any bankruptcy or similar proceedings); (f) to protect the rights, privacy, safety or property of Tanglewood, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

We may use and disclose Other Data for any purpose, except where we are not allowed to under applicable law.

Other Important Provisions

- Non-Tanglewood Group Entities: This Privacy Statement does not address, and we are not responsible for the privacy, data, or other practices of any entities outside of Tanglewood, including Authorized Licensees, Strategic Business Partners, or any third party operating any site or service to which the Services link, payment service, or website that is the landing page of the high-speed

Internet providers at our properties. The inclusion of a link on the Online Services does not imply endorsement of the linked site or service by us. We generally have no control over, and are not responsible for, any third party's collection, use and disclosure of your Personal Data. In addition, we are not responsible for the data collection, use, disclosure, or security policies or practices of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Data you disclose to other organizations through or the Apps or our social media pages.

- **Security:** We seek to use reasonable organizational, technical, and administrative measures to protect Personal Data. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you feel that the security of your account has been compromised), please immediately notify us in accordance with the "Contact Us" section, below.
- **Retention:** We will retain your Personal Data for the period necessary to fulfill the purposes outlined in this Privacy Statement unless a longer retention period is required or permitted by law. The criteria used to determine our retention periods include:
 - The length of time we have an ongoing relationship with you and provide the Services to you (for example, for as long as you have an account with us or keep using the Services)
 - Whether there is a legal obligation to which we are subject (for example, certain laws require us to keep records of your transactions for a certain period of time before we can delete them)
 - Whether retention is advisable considering our legal position (such as, for statutes of limitations, litigation, or regulatory investigations)
- **Sensitive Data:** Unless specifically requested, we ask that you not send us, and you not disclose, on or through the Service or otherwise to us, any Sensitive Personal Data (e.g., social security number, taxpayer identification number, passport number, driver's license number, or other government-issued identification number; credit or debit card details or financial account number, with or without any code or password that would permit access to the account, credit history; or information on race, religion, ethnicity, sex life or practices or sexual orientation, medical or health information, genetic or biometric information, biometric templates, political or philosophical beliefs, political party or trade union membership, background check information, judicial data such as criminal records, or information on other judicial or administrative proceedings).
- **Use of Services by Minors:** The Services are not directed to individuals under the age of eighteen (18), and we request that they not provide Personal Data through the Services.